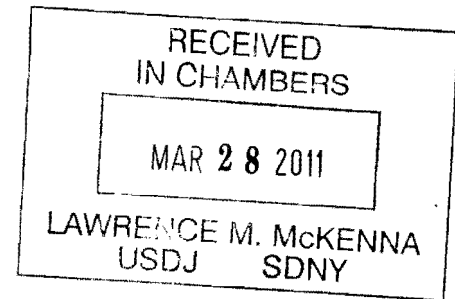


**NAPOLI BERN RIPKA LLP**  
Attorneys • At • Law

March 24, 2011

Honorable Lawrence M. McKenna  
United States District Judge  
United States District Court  
Daniel Patrick Moynihan  
500 Pearl Street  
NY, NY 10007

**MEMO ENDORSED**



Re: *In The Matter Of The Complaint Of ANDREW HARNETT, As Owner Of  
Vessel M/V READY JET GO*  
Docket No.: 06-0699 (LMM)

*In The Matter Of Peter J. Sharp Boathouse, Inc., As Owner Of The  
Floating Vessel Constituting The Boat House, Seeking Exoneration From  
Or Limitation Of Liability*  
Docket No.: 06 Civ. 3061 (LMM)

*In The Matter Of New York Rowing Association, Inc. As Owner Of A  
2001, Coxless Empacher Rowing Shell, Seeking Exoneration From Or  
Limitation Of Liability*  
Docket No.: 06 Civ. 3062 (LMM)

*And a fourth related case.*

Dear Hon. McKenna:

We represent the Runsdorf Claimants in the above-mentioned matter. We write this joint letter on behalf of all counsel to ask the Court to extend the fact-discovery deadline from March 8, 2011 to *April 8, 2011*.

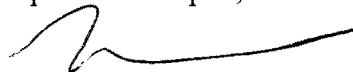
Since the last Court appearance of February 4, 2011, the deposition of Mr. Harnett has been held; Claimants have served liability and damages expert reports; and a proposed confidentiality order has been submitted to the Judgment Clerk.

Lastly, Counsel for the New York Rowing Association noticed depositions of non-party witnesses for April 6, 2011. Claimants are reserving the right to take perpetuation depositions of any witnesses, who are outside of the subpoena power of the court, or may not be available to testify at the time of trial.

We look forward to our next conference on June 8<sup>th</sup>, 2011.

Accepted. So ordered.  
 Wm. M. R. (SM) 3/28/11  
 NAPOLI BERN RIPKA LLP

Very truly yours,  
Napoli Bern Ripka, LLP

A handwritten signature in black ink, appearing to read 'Marina Zapantis', with a long horizontal flourish extending to the right.

Marina Zapantis, Esq.

Cc:

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